

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
SOUTHWESTERN DIVISION

UNITED STATES OF AMERICA

v.

FRANK ANTHONY VILLA and
CHARLES NMN AHUMADA

INDICTMENT

Case No. _____

Violation: 21 U.S.C. §§ 841(a)(1)
and 846; and 18 U.S.C. § 2

COUNT ONE

**Conspiracy to Possess with Intent to Distribute and Distribute
a Controlled Substance**

The Grand Jury Charges:

From in or about November 2014 through the date of this Indictment, the exact
dates unknown to the grand jury, in the District of North Dakota, and elsewhere,

FRANK ANTHONY VILLA and
CHARLES NMN AHUMADA

did knowingly and intentionally combine, conspire, confederate, and agree together with
others, both known and unknown to the grand jury, to possess with intent to distribute
one kilogram or more of a mixture and substance containing a detectable amount of
heroin, a Schedule I controlled substance, in violation of Title 21, United States Code,
Section 841(a)(1), and Title 18, United States Code, Section 2.

OVERT ACTS

In furtherance of this conspiracy and to effect and accomplish the objects of it, one
or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did possess with intent to distribute in excess of one kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within the state of North Dakota, and elsewhere;

2. It was further a part of said conspiracy that one or more of the conspirators transported heroin into North Dakota for the purpose of further distribution;

3. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;

4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities; and

5. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;

In violation of Title 21, United States Code, Section 846; and Title 18, United States Code, Section 2; and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

Possession with Intent to Distribute a Controlled Substance

The Grand Jury Further Charges:

On or about December 29, 2014, in the District of North Dakota,

FRANK ANTHONY VILLA and
CHARLES NMN AHUMADA

knowingly and intentionally possessed with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Grand Jury Foreperson
Foreperson

/s/ Timothy Q. Purdon
TIMOTHY Q. PURDON
United States Attorney

MTM/rab/tmg